

Peter SZANTO 949-887-2369
11 Shore Pine
Newport Beach CA 92657

UNITED STATES DISTRICT COURT
in and for the District of Oregon
1000 SW Third Ave, Portland ORE 97204

In Re:

Peter SZANTO

3:20-mc-1070 SI

Notice of Motion
and Motion

1) **For Leave to Respond to Appellees'**

Absurd Speculation About Peter

Szanto's Finances

2) **For Leave to Seek Striking of Scurrilous**

Material Filed to Embarrass Peter Szanto

3) **For Leave to Seek Sanctions Regarding**

Violations of Singapore Law

Hon. Judge Simon

1. Certification in Compliance with Local Rule 7-1(a)

This Court's Motion Practice rule requires pre-motion party conferral. On
November 16, 2020 Peter Szanto telephoned Mr. Blackledge, who had appeared in this

1
2 case through his associates, seeking discussion regarding matters related to the
3 scurrilous material he has filed. Szanto's call went to voice mail. Szanto requested a
4 return call so that the his concerns could be discussed.

5
6 As of the close of business on 11/16/20, Szanto has received no return call.
7 Therefore, pursuant to LR 7-1(a)(1)(B), opposing counsel did not confer with Szanto.
8

9 **2. NOTICE**

10 To the respondents and the Court, please take notice, the Court's ORDER
11 [Docket Entry # 13], contemplated Trustees' response. However, no provision was made
12 related to Peter Szanto's response to the Trustees' absurd analysis of unrelated papers
13 from Singapore.

14
15 Thereupon, comes now Peter Szanto seeking relief so as so respond to those
16 matters filed in [Docket Entries 16 and 17].

17 **3. FACTS**

18
19 **First, and foremost**, the Trustees have filed a number of documents from the
20 litigation between these same parties in Singapore (Docket Entries 17-1 thru 17-7)
21

22
23 Peter Szanto has nothing to hide in those documents.

24
25 However, Singapore's courts and Singapore law does not have any "public
26 record" provision for placing documents from litigation into any PUBLIC RECORD.
27 Only after the Singapore Supreme Court has been petitioned and granted leave for
28 dissemination can documents be disclosed outside the action itself.

1
2 That is, all Singapore Supreme filed court documents are filed under seal, until
3 a specific court order allows dissemination item-by-item (and never by the entire case).
4

5 Nor does the Singapore legal system provide for any dissemination of filed
6 documents without court permission.
7

8 Trustees have neither sought nor obtained Singapore Supreme Court leave of
9 court to file Exhibits 17-1 through 17-7 in this Court.
10

11 Thus, by filing the various Singapore court documents in this Court (such that
12 those documents are now PACER accessible to everyone in the world, those documents
13 are now completely public, without any privacy restriction), Mr. Backlidge committed a
14 **contempt upon not merely contra party Szanto, but also upon the justice of the**
15 **Singapore Supreme Court hearing the matter, as well as, the people of Singapore.**
16

17 Peter Szanto asks leave further to elucidate this matter with view toward the
18 possibility and appropriateness of this Court taking immediate action regarding the plain
19 fact that a member of the Oregon bar, an officer of this Court, intentionally committed
20 contempt upon the Supreme Court of Singapore (a separate and sovereign nation) by
21 the intentional placing of sealed material without the Singapore Supreme Court's leave
22 or permission into the worldwide public record!!
23

24 Second, the speculation regarding Peter Szanto's finances makes numerous
25 **obscene and absurd speculations** regarding chemotherapy.
26

27 Indeed, it is impossible to comprehend the correlations to Peter Szanto's
28 finances which are being attempted:

1
2 a) Peter Szanto must travel to Las Vegas and Phoenix for chemotherapy
3 because clinics closer to Peter Szanto are overwhelmed with Covid.
4 The suppositions made by Trustees are simply unclear correlates as to
5 Peter Szanto's financial life. For example, the fact that Peter Szanto
6 travels to receive chemotherapy does not mean he has discretionary
7 income. Rather it means Peter Szanto takes the **free** gamblers special
8 bus for seniors to Las Vegas. Then, because he has no money to
9 gamble, he walks to the chemotherapy clinic for treatment.

10
11 Trustees' **tortured effort** to paint these events in the light of hidden
12 funds is heinous and portends another FRCP 11 motion for such
13 knowing disgraceful outrage!!
14

15
16 b) Peter Szanto's duties in the Israeli Defense Force (IDF), after 55 years
17 of service, are of a supervisory and leadership nature. The need to have
18 chemotherapy does not constrain Szanto's IDF obligations nor the
19 performance of his duties.

20
21 Indeed, the speculation about Peter Szanto's chemotherapy is merely
22 another obscene aspect of the manner in which Trustees **battle with**
23 **reality**. Chemotherapy, intravenous chemical medical treatment, is
24 necessary for Peter Szanto to stay alive.

25
26 Are Trustees attempting a correlation between obtaining necessary
27 medical treatment and having undisclosed income ? What is the point
28 they seek to establish beyond pure ridiculous speculation??

1
2 c) Travel to Israel meant for IDF active duty is provided by the IDF. IDF
3 planes, hundreds of times a day, fulfill many tasks around the world. IDF
4 planes daily arrive and depart from Los Angeles (30 miles from Szanto's
5 home). A seat on any IDF plane, **without charge**, is always available to
6 an IDF officer travelling to Israel to fulfill his military obligations.

7
8 d) Peter Szanto's Aunt celebrated her 100th birthday this year. She is a
9 holocaust survivor, a veteran of 3 of Israel's wars, a military advisor to
10 Israel's cabinet, a renowned archaeologist (called on by many groups:
11 freeway contractors, freeway opponents and theologians to make certain
12 that roads and buildings do not desecrate holy places).

13
14 The birthday party was attended by hundreds of people whose lives
15 she has bettered, including Peter Szanto's. To have missed that party,
16 regardless of Covid would have been unthinkable.

17
18 There was no cost to travel because Peter Szanto travelled by his IDF
19 credentials and co-ordinated his service commitment with the party.

20
21 **Without charge**, while in Israel, Szanto stayed either at his Aunt's
22 house or at military barracks. What is Trustees' contra contention?

23
24 In sum, it is impossible to comprehend, what argument related to Peter
25 Szanto's finances or ability to afford counsel is being made.
26
27
28

1
2 e) Trustees, in their accusation at (DE 16, p. 4):

3 Debtor suggests that he is able to work, in his most
4 recent filing, if it were not for the appeals, but leaves
5 open the question of whether he is working at all and if
6 he was working until the appeals became overwhelming,
7 when and where he was working.

8
9 The requirement of IFP form was to list income and resources.

10 What is Peter Szanto accused of doing or not having done?

11
12 f) In Trustees' EXHIBIT 6, Szanto wrote:

13 I have practiced law in 5 nations where the common law was
14 foundational to fundamental freedom, essential fairness and
15 the equitable administration of justice.

16 This is a statement made in the **past tense**. Something having occurred.

17 Instead, Trustees misconstrue and misrepresent to this Court at

18 (DE 16, p. 4):

19 As revealed by Exhibit 6, Debtor is a practicing attorney
20 in five different nations. Yet this was not disclosed in his
21 bankruptcy schedules.

22 Irrespective of Trustees effort to mislead, Szanto averred no current
23 attorney licensure. Therefore, in 2016 there was no bankruptcy
24 disclosure which was required.

25 The question to the Trustees is: beyond butchering plain English
26 statements, **what financial analysis points are being made??**

27 g) Then at (DE 16, p. 5) comes the Trustees' greatest absurdity:
28

1
2 Taken together, the exhibits authored by Debtor and filed with
3 various Courts, reveal a lack of credibility concerning both the
Debtor's actions and the Debtor's financial status.

4
5 Again !! – Trustees are merely conclusory to create an abstraction of
6 reality!! What precise statement of Peter Szanto's lacks credibility ?
7 How does it lack credibility? What statement contradicts what other
8 statement?

9
10 The Trustees statements are grossly abusive, because suggestions are
11 made which are not even supported by innuendo.

12 And lastly, what objective financial analysis is offered ? **NONE!!**

13
14 **a. Requests**

15
16 Thereupon, Peter Szanto asks the Court to consider striking [DE 16 and 17]
17 as highly scurrilous and non-responsive to any objective financial inquiry.
18

19 Second, additional time is requested to perfect an application regarding
20 the Trustees' contemptuous act against the laws of the Nation of Singapore by placing
21 sealed material into the public record.
22

23 Third, an extension is requested to file a more thorough response to the
24 many absurd efforts to mislead this Court in Docket Entry 16 and 17]
25
26
27
28

4. Conclusion

Extension of time is prayed fully to respond to the Trustees' diatribe which failed to offer any objective financial analysis.

Most Respectfully,

Dated 16 November 2020 /s/ signed electronically Peter Szanto

Proof of Service

My name is Maquisha Reynolds, I am over 21 years of age and not a party to the within action. My business address is PO Box 14894, Irvine CA 92623. On the date indicated below, I personally served the within: **Motion** by e-mail to contra parties at:

1) United States Bankruptcy Court
1050 SW Sixth Avenue # 700
Portland OR 97204

2) Gary L. Blacklidge
Jordan Ramis PC
2 Centerpointe Drive, 6th Floor
Lake Oswego, OR 97035

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Signed at Irvine CA.

Dated November 16, 2020 /s/ signed electronically Maquisha Reynolds